

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ROBERT FIREBAUGH, and	)	
STELLA FIREBAUGH,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Cause No.: 4:08-CV-01161 ERW
	)	
3M COMPANY, et al.,	)	
	)	
Defendant.	)	JURY TRIAL DEMANDED

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**MOTION FOR ENTRY OF PROTECTIVE ORDER**

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COMES NOW, **Plaintiffs**, Robert Firebaugh and Stella Firebaugh, in the above entitled and numbered cause of action, and makes and files its Motion for Entry of Protective Order.

1. The parties to this case, both Plaintiffs and Defendants, have entered into an agreed protective order for the production of certain documents from ISP, Inc. ISP, Inc. was the employer for Plaintiff, Robert Firebaugh, for over thirty years. The parties are seeking discovery from ISP, Inc. on issues relating to industrial hygiene in the plant; dust collection systems and other safety related matters relating to exposure to silica dust. ISP, Inc. has requested a protective order before the production of such items and the parties have agreed to maintain confidentiality of these documents pursuant to the terms in the attached order. Plaintiffs respectfully request this court enter this order in order for discovery to proceed with ISP, Inc.

Respectfully submitted,  
MALONEY★MARTIN, LLP

/s/ Mike Martin

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

I certify that on February 17, 2010, I conferred with opposing attorneys John Kurowski and Michael Smith, and they do not oppose this Motion to for Entry of Protective Order.

/s/ Mike Martin

MIKE MARTIN

**CERTIFICATE OF SERVICE**

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, I hereby certify that a true and correct copy of the foregoing document has been provided to all counsel of record and/or attorneys-in-charge via Certified Mail, Return Receipt Requested, and/or via facsimile, and/or via hand delivery, and/or via U.S. Mail on this the 17<sup>th</sup> day of February, 2010.

/s/ Mike Martin

MIKE MARTIN